

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

CIVIL ACTION, FILE NO.: 04CV10026WGY FILED

In Open Court
USDC, Mass.
Date 3/19/04
By SG
Deputy Clerk

DOROTHY FANNIN,)
ADMINISTRATOR OF THE ESTATE)
OF MALINDA SUE FANNIN,)
PLAINTIFF)
VS.)
OCEAN CREST SEAFOOD, INC. AND)
BRUCE HILDEBRANDT,)
DEFENDANTS)

JOINT STATEMENT

PURSUANT TO NOTICE

OF SCHEDULING

CONFERENCE

The parties in the above-entitled matter hereby submit the following joint statement pursuant to the Court's Notice of Scheduling Conference:

I. PROPOSED PRE-TRIAL SCHEDULE

A. PROPOSED DISCOVERY PLAN

1) The parties propose:

- a) that all factual discovery in this matter be completed by December 31, 2004.
- b) that plaintiff must disclose experts, pursuant to Fed. R. Civ. P., thirty (30) days prior to the close of fact discovery.
- c) that the defendants must disclose experts thirty (30) days from receipt of plaintiff's expert disclosures.
- d) that all expert depositions must be completed within thirty (30) days after the close of fact discovery.

March 19, 2004
YOUNG, D.J.

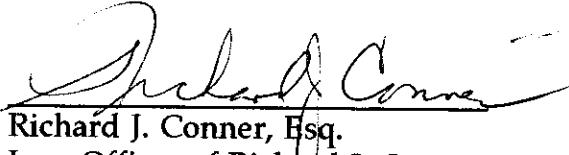
So ordered as the case management scheduling order.

Discovery due Jan 31, 2004
Dispositive Motions due Jan 31, 2004

William G. Young
U.S. District Judge

- 2) The parties agree that there is no reason to phased discovery in this case and that each defendant should be permitted the same number of discovery inquiries as the plaintiff.
- 3) All motions must be filed within thirty (30) days after the close of fact discovery.
- 4) The parties are unable, at this time, to agree on whether they will consent to trial by magistrate judge.

Respectfully submitted,
The Plaintiff,
By Her Attorney,


Richard J. Conner, Esq.
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BBO No.: 094860

Respectfully submitted,
The Defendants,
By Their Attorney,


D. Michael Arter, Esq.
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Dated: March 12, 2004